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March 17, 2000

TO:

Internal File

THRU:

Peter Hess, Reclamation Specialist III, Team Lead for fit PH

FROM:

Wayne H. Western, Reclamation Specialist III 10 to to

RE:

Surface Facility As-Builts, West Ridge Resources, Inc., West Ridge Mine,

ACT/007/041-AM00B

SUMMARY:

On February 16, 2000, the Division received as-built maps for the surface facilities of the still under construction West Ridge Mine. The submittal consists of the proper C-1 and C-2 forms, Table 16A, which consists of "as-constructed" volumes for the dual cell sediment pond, and as constructed Maps 5-5, Surface Facility Map and 7-4, Sediment Pond-Plan and Profile.

TECHNICAL ANALYSIS:

OPERATION PLAN

BACKFILLING AND GRADING

Regulatory Reference: 30 CFR Sec. 785.15, 817.102, 817.107; R645-301-234, -301-537, -301-552, -301-553, -302-230, -302-231, -302-232, -302-233.

Analysis:

The Permittee originally proposed to create small highwalls during the construction of the portals. During construction the Permittee discovered that the coal near the outcrop had been burned. The Permittee could not follow the approved mine plan because of the burned coal and constructed larger highwalls. The Division staff estimates that the highwalls are now 40 to 50-44. higher than planned.

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A major concern about the highwalls is highwall elimination during reclamation. Since the area was not disturbed before mining the Permittee is required to reclaim all highwalls. See R645-301-553.120.

The Permittee must give the Division as built drawing of the highwalls. The Permittee must also show that the existing reclamation plan is adequate to reclaim the highwall or submit a modified reclamation plan. The Division is concerned that in order for the Permittee to reclaim the highwalls they will have to move the toe of the slope to meet stability requirements. If the toe extends into the experimental practice area, the Permittee must show how that area will be reclaimed. The Permittee must also show that the reclaimed slopes will have safety factors of at least 1.3. See R645-301-553.130.

Findings:

The information in the proposed amendment is not considered adequate to meet the requirements of this section. Prior to approval, the Permittee must provide the following in accordance with:

- **R645-301-521.120**, The Permittee must give the Division accurate maps and cross sections of the highwalls. The maps and cross sections should be at a scale large enough for the Division to determine the extent of the disturbance.
- **R645-301-553.120**, The Permittee must show that the reclamation plan, maps and cross sections how the highwalls will be eliminated.
- **R645-301-553.130**, The Permittee must show that the reclaimed slopes associated with the highwalls will have a safety factor of at least 1.3.

RECOMMENDATIONS:

The amendment should be returned to the Permittee along with the deficiencies.